

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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DEBORAH YOUNG, Individually and as the
parent and natural guardian of [REDACTED]
[REDACTED] and [REDACTED],

Docket No. CV 09-3325 (JFB)(ARL)

Plaintiffs,

-against-

SUFFOLK COUNTY; SUFFOLK COUNTY
DEPARTMENT OF SOCIAL SERVICES;
SUFFOLK COUNTY POLICE DEPARTMENT;
MICHAEL DELGADO; JOSEPH QUATELA;
EDMUND J. COPPA, Individually and EDMUND J.
COPPA PHOTOGRAPHY; RAYMOND L. YOUNG;
RAYMOND M. YOUNG; NEWS 12; NEWSDAY,
NEW YORK POST; NEW YORK DAILY NEWS;
WCBS.COM,

Defendants.

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**VERIFIED REPLY OF THE PLAINTIFF TO THE DEFENDANTS'
VERIFIED ANSWER AND COUNTERCLAIM**

Plaintiff, by her attorneys, The Law Offices of Thomas F. Liotti, for her reply to the counterclaim contained in the Verified Answer of the Defendants, RAYMOND L. YOUNG and RAYMOND M. YOUNG alleges:

AS TO THE COUNTERCLAIM
ASSERTED ON BEHALF OF RAYMOND L. YOUNG

1. Plaintiff denies knowledge or information sufficient to form a belief as to the truth of the allegation contained in paragraph 1 of the Counterclaim.
2. Plaintiff denies the allegation contained in paragraph 2 of the Counterclaim, except admits that she resided at the property with her three children and had exclusive use and

occupancy thereof.

3. Plaintiff denies the allegation contained in **paragraph 3 of the Counterclaim.**
4. Plaintiff denies knowledge or information sufficient to form a belief as to the truth of the allegation contained in **paragraph 4 of the Counterclaim.**
5. Plaintiff denies the allegation contained in **paragraph 5 of the Counterclaim.**
6. Plaintiff denies the allegation contained in **paragraph 6 of the Counterclaim.**
7. Plaintiff denies knowledge or information sufficient to form a belief as to the truth of the allegation contained in **paragraph 7 of the Counterclaim.**
8. Plaintiff denies the allegation contained in **paragraph 8 of the Counterclaim.**

AS AND FOR PLAINTIFF'S FIRST AFFIRMATIVE DEFENSE

9. Defendant, RAYMOND L. YOUNG, fails to state a cause of action upon which relief can be granted.

AS AND FOR PLAINTIFF'S SECOND AFFIRMATIVE DEFENSE

10. The Defendant's claims are barred by the statute of limitations.

AS AND FOR PLAINTIFF'S THIRD AFFIRMATIVE DEFENSE

11. The Defendant's claims are barred as a result of the Defendant's own culpable conduct in this matter.

AS AND FOR PLAINTIFF'S FOURTH AFFIRMATIVE DEFENSE

12. The Defendant's claims are barred under the doctrine of "Unclean Hands."

AS AND FOR PLAINTIFF'S FIFTH AFFIRMATIVE DEFENSE

13. The Defendant's claims are barred under the doctrine of "Laches."

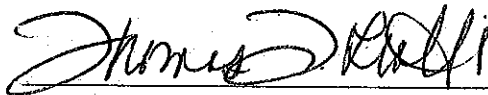
AS AND FOR PLAINTIFF'S SIXTH AFFIRMATIVE DEFENSE

14. The Defendant lacks standing to assert such claims.

WHEREFORE, Plaintiff demands judgment dismissing the counterclaim contained in the Defendants' Verified Answer, together with costs and disbursements of the above entitled action, and demands judgment as demanded in the complaint.

Yours etc.,

Dated: Garden City, New York
May 14, 2010



LAW OFFICES OF THOMAS F. LIOTTI

By: Thomas F. Liotti, Esq. (TL 4471)

Attorneys for Plaintiffs

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To:

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1001 Franklin Ave.
Garden City, New York 11530

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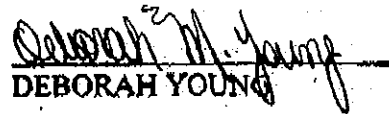
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DECLARATION OF VERIFICATION

STATE OF NEW YORK)
 :ss:
COUNTY OF NASSAU)

DEBORAH YOUNG, being duly sworn, says that she is the Plaintiff in the above-named proceeding and that she has read the foregoing Reply to the Defendants Raymond L. Young and Raymond M. Young's Answer with Counterclaim and knows the contents thereof; and the same is true to her own knowledge, except as to matters therein stated to be alleged on information and belief and as to those

matters she believes it to be true.


DEBORAH YOUNG

Sworn to before me this
20th day of May, 2010


Notary Public

LUCIA M. CIAVINO
NOTARY PUBLIC, STATE OF NEW YORK
NO. 01616081004
QUALIFIED IN QUEENS COUNTY
COMMISSION EXPIRES JULY 9, 2011 //